

The certificate has expired. So how did this place get gas?

Eric Cathcart, Manager, Regulatory Assistance Section

Recently, an unregistered tank was reported as being in use. According to the tank owner, the supplier had never mentioned that the tank should be registered (in the 20 years since registration has been required, there have been several suppliers involved). As a result, both the tank owner and the current supplier/transporter have been issued a Notice of Violation.

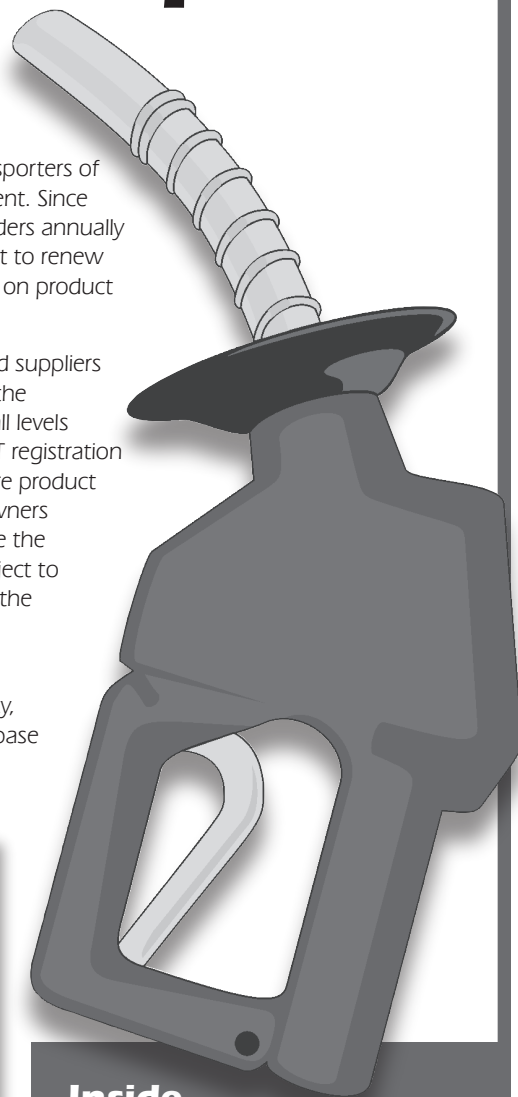
Deliveries to facilities that do not currently have a valid registration certificate are unlawful under the State Underground Petroleum Environmental Response Bank (SUPERB) Act of 1988. In accordance with Section 44-2-60, no person may place a regulated substance and no owner or operator may cause a regulated substance to be placed into an underground storage tank for which the owner or operator does not currently hold a valid registration.

In a direct mail campaign more than 10 years ago, the S.C. Department of Health and Environmental Control's (DHEC) Underground Storage Tank (UST)

Program notified suppliers and transporters of the registration certificate requirement. Since then, the UST Program reminds readers annually in this newsletter of the requirement to renew registration certificates and the ban on product delivery if the certificate is not valid.

Owners, operators, transporters and suppliers share responsibility to comply with the statutes. Prudent management at all levels would include verifying that the UST registration at a facility is current and valid before product goes into the tank. Transporters, owners and operators that choose to ignore the requirements of the statute are subject to enforcement actions as provided in the SUPERB Act.

If there are questions about the registration status of a tank or facility, please call the UST Program's data base manager at **(803) 896-6840**.



Oops! Did it again!

'Cross-dropped' fuel can be a serious problem.

Susan Avery, UST Inspector,
Sumter Environmental Quality Control Office

Dropped the wrong fuel in the tank. This inspector ran into this situation recently – the industry calls it a cross-drop. In this case, regular unleaded fuel was cross-dropped into a kerosene tank. This is an especially dangerous situation because it is the time of the year for kerosene home heaters! This could be a disaster!

If a cross-drop occurs, the UST owner/operator should immediately take the affected system(s) out of service and contact the distributor/supplier for advice. In some cases, the fix is to empty the tank(s) and refill. In other cases (premium fuel cross-dropped into a regular unleaded tank), the owner/operator may choose to let the customers benefit by offering the higher-octane fuel as regular fuel.

Owners and operators can help prevent cross-drops by knowing what they ordered and confirming with the driver that the right fuel is on the truck. Then, the owner/operator should monitor the delivery as it occurs. An added benefit of monitoring the delivery is preventing releases due to overfills.

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Striker Plates: Do you have them?

Eric Cathcart, Manager,
Regulatory Assistance Section

The UST Program recently received a report of a release of petroleum product from a single-walled fiberglass tank due to physical damage that occurred during routine tank gauging operations.

The gauging stick penetrated the bottom of the tank directly under the fill port. The tank lost nearly 5,000 gallons of product overnight. The subsequent investigation found a hole directly under the drop tube and revealed that a striker plate was not present in the tank.

A striker plate is a reinforcing pad directly under the fill port that protects the tank bottom from wear and injury caused by the measuring stick.

Unfortunately, this is not an isolated event. Similar incidents have been reported from at least one other state. Additionally, at this same facility, the owner discovered that striker plates were also missing in the remaining tanks.

It is most important that owners of single-wall fiberglass tanks – installed prior to 1990 – inspect the tanks to determine if striker plates are present. If striker plates are missing, please contact the UST Program to report which tanks do not have striker plates.

Next, contact the tank manufacturer to find out if the tanks can be repaired. If you cannot determine whether or not striker plates are in place in the tank, you should contact a tank inspection service for assistance. Continuing to stick tanks without a striker plate may result in tank damage, a release of product, costly repairs and cleanup.

Please contact the UST Program at **(803) 896-7957** if there is a problem or if things just don't look right.

Pump Sumps: A Solution for a Recurring Threat

Mike Arthur, UST Inspector,
Aiken Environmental Quality Control Office

Many tank owners have upgraded their systems to include submersible turbine pump sumps to help protect a tank's piping, pumps and line leak detectors from corrosive elements such as soil and water. But too many times, when inspectors open manholes and peer into the sumps, the flexible metal piping is submerged in water – **and flexible metal piping is vulnerable to corrosion.**

For a number of years, the UST Program accepted rubber zip-boots around the endangered metal parts as sufficient corrosion protection in a sump. It was believed that the boots would keep the flex-piping dry.

Reality tells a different tale. A zip-tied zip-boot is a flawed means of protection. Water is a tricky beast to control and it can easily penetrate into those boots – no matter how tightly they are installed. Once water enters the boots – and it always does – corrosion is again a clear, present and uncontrolled threat to the UST system.

Since boots are no longer a viable option for corrosion protection in a sump, what works?

One solution for owners is to repair the sumps. Water is getting in somehow. Figure out where it is coming from and correct the problem. If that is not feasible, simply monitor your sumps on a regular basis. Inspect the dispenser and pump sumps at least monthly. If a storm rolls through, check behind the storm to make sure everything is still dry. If water has penetrated the sumps, pump out the liquid and dispose of it in a clean and responsible manner. In other words, **DO NOT** pump it down the storm drain or sewer.

The ultimate means of controlling corrosion is to aggressively manage water by sealing sumps or keeping them pumped out. Open up those manholes, remove those sump lids and get to know the equipment you own and operate.

Notes from Permitting

Alison Hathcock, Regulatory Assistance Section

Our goal is to give you quick, professional assistance and to ensure the UST systems going into the ground provide leak-free service. The following procedures will help us help you better!

- **Issue:** Tank Removal Contractors versus Tank Disposal Locations
- **Recent Scenario:** There has been some confusion as to whether or not contractors who remove tanks need to be certified.
- **Correct Procedure:** The UST Program does not issue or require permits/certification for individuals or companies that perform tank removals in South Carolina. Individuals or companies performing a tank removal must comply with local (city or county) permitting or certification requirements. Also, if the tank is being hauled to a disposal company/location in South Carolina, the disposal company must have a permit from DHEC's Bureau of Land and Waste Management. The UST Program maintains a list of permitted disposal companies/locations in South Carolina. The Solid and Hazardous Waste Compliance may be contacted at **(803) 896-4207** regarding the specific permitting requirements. Please contact the UST Program's permitting coordinator at **(803) 896-6942** with any questions.

Environmental Excellence Awards for Fall 2007

The winners of the UST Environmental Excellence Award for underground storage tank operations in this edition of "UST News" have many things in common. They include excellent tank management plans, regular maintenance and inspections and a commitment to stay in compliance as well as protect the environment. They are all small operations – and during this term – they eclipsed all competitors with their excellence.

ENVIRONMENTAL EXCELLENCE AWARD WINNERS

- **Greenwood County School Bus Shop, Non-commercial Category** – The nomination said, "No violations ever, and like most school bus shops, their records are always well-organized and their tests are ALWAYS done on time. The UST program also awards a special "tip of the hat" to **John Little**, the UST compliance guru with the S.C. Department of Education.
- **IT'S A TIE! Walts Shoals Junction Station and Darby Oil, Small Commercial Category** – This month, two of the best facilities in the state were honored in a tie for this award. **Walt Lowe** owns and operates **Walt's Shoals Junction Station** in Hodges. Lowe actually seems to enjoy getting ready for an inspection. He has immaculate housekeeping, a spotless record and a "let's get this done" approach that marks him as an excellent UST owner/operator. The other recipients of this award are two facilities in Chester operated by Darby Oil, **Grants Grocery** and the **Darby Oil Facility**. Their record of compliance goes back to the early 1990s – when the program began inspections. Much of the credit for this solid record is due to the efforts of **Rusty Darby**.

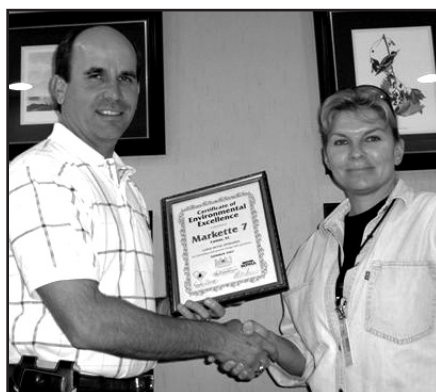
NEW! INSTALLERS' EXCELLENCE AWARD WINNER

The UST Program has instituted an award to recognize contractors who consistently meet or exceed the permitting standards. Factors that are considered for this recognition include: complete permit applications with required supplemental information; 48-hour notification for installation inspections; and timely written notification when ballasting with fuel.

The first winner of the UST Installers' Excellence Award is **Progressive Builders, Inc.** (**Steve, Stephen and George Roach** of Greenville). Progressive Builders consistently submits complete and legible permit applications. They provide at least 48-hour notice for installation inspections and they have standard operating procedures that meet the ballasting notification requirement for new tank installations. The UST Program applauds their efforts to maintain a high standard of excellence for each UST installation.



Steve and Stephen Roach were recently presented with the first UST Installers' Excellence Award. They accepted the award on behalf of their company, Progressive Builders, Inc.



A previous winner, Camp Segars with West Oil Company's Markette Stores, receives an Environmental Excellence Award from UST Inspector Susan Avery.

How can you prevent a 280.20(e)?

(or How can you prevent a 'Failure to Install to Industry Standards?')

Mallori McAllister,
UST Inspector, DHEC's
Beaufort Environmental
Quality Control Office

New facility? Old facility? No matter. There are several easy steps that can help insure some basic UST system components have been installed according to the manufacturer's instructions.

1. Find the vent lines.

- a. Vents are required to be at least 12 feet tall if they stand alone, or protrude at least 3 feet above the roof line if attached to a building. Having vents at the appropriate height ensures vapors are emitted into the air column rather than being sucked into an air-handler or where they might collect in an area where people are.
- b. Ask, "Are the vent lines properly capped?" There are several varieties of caps, but all vents should have a cap. Basic caps ensure rainwater is not getting into the tank; more advanced caps limit the amount of vapors that are released from the tank. Beware, heavy winds can dislodge vent caps; check them periodically.

2. Open the dispensers and make sure there is a shear valve on every pressurized product line.

- a. The shear valves must be anchored to an anchor bar that is attached to the island or to a retrofit anchor bar. Regardless of the type of anchor bar, all "U" bolts,

Continued, see **PREVENT** on Page 4

Status report on proposed changes to UST Control Regulations 61-92

Bob Hutchinson, Director, Regulatory Compliance

On December 13, 2007, the S.C. Board of Health and Environmental Control (Board) held a public hearing to receive comments regarding the proposed changes to the UST Control Regulations. Following the public hearing, the Board gave approval for DHEC to submit the proposed UST Control Regulations to the S.C. General Assembly for review.

The changes to the regulations are necessary for the state to be compliant with the Energy Policy Act signed into law by President George W. Bush in August 2005. The new requirements mandate secondary containment for new UST systems installed within 1000 feet of a community water system or potable drinking water well, and require operators of UST systems to be trained.

During the regulation development process, UST Program staff held stakeholder meetings statewide to ensure UST owners and other interested parties had an opportunity to make suggestions and comments on the new proposed regulations.

Thanks to the many UST owners and operators, the S.C. Petroleum Marketers Association, the S.C. Petroleum Council and other representatives of industry that participated in the regulation development process. Through this cooperative effort, the best possible changes have been proposed for legislative review.

PREVENT, continued from page 3

brackets, and anchoring mechanisms must be tight and flush with the shear valve faceplate. Shear valve anchors should be able to withstand 650 pounds of pressure. If you can move it with your hand, it's not tight enough. Also, the "shear" point on the anchor should be level with the top of the dispenser island.

- b. The "U" bolts must fit into the channel around the shear valve.
- c. Finally, if the anchor bar cross member consists of two parallel pieces of steel, channel brackets must be in place opposite every "U" bolt to prevent washers from pulling through the cross member.

These checks will help insure that the basic components have been installed according to the manufacturer's instructions. If you have questions about these suggestions, contact the UST Compliance Section at **(803) 896-7957**.



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